

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

Title 18, United States Code, Section 1344(1) and (2) - Bank Fraud

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: 30 years imprisonment; 1,000,000.00 fine; 5 years supervised release; special assessment.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

ADAM SHAFI

DISTRICT COURT NUMBER

CR 15-0582 WHO

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior summons was served on above charges

2) Is a Fugitive

3) Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY

4) On this charge

5) On another conviction

6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

} Federal State

Has detainer Yes
 been filed? No

} If "Yes"
 give date
 filed

DATE OF
 ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
 TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

Name and Office of Person
 Furnishing Information on this form

Alex G. Tse

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.
 Attorney (if assigned)

Elise LaPunzina

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

1 ALEX G. TSE (CABN 152348)
2 United States Attorney
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FILED
2018 DEC -6 P 1:46
SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NO. DIST. OF CA.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA,) NO. CR 15-0582 WHO
13 Plaintiff,) VIOLATIONS: 18 U.S.C. §§ 1344(1) and (2) – Bank
14 v.) Fraud
15 ADAM SHAFI,)
16 Defendant.)
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S U P E R S E D I N G I N F O R M A T I O N

19 The United States Attorney charges:

20 Introductory Allegations

21 1. Defendant ADAM SHAFI resided in California.

22 2. Bank of America was a financial institution, as that term is defined in Title 18, United
23 States Code, Section 20, the deposits of which were insured by the Federal Deposit Insurance
24 Corporation (“FDIC”).

25 3. Secto Services LLC was a title company located in Florida.

26 4. Setco Services LLC held a bank account at Centennial Bank located in Florida.

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The Scheme to Defraud

5. Beginning at a date unknown, but no later than April 2015, and continuing through on or about June 29, 2015, SHAFI knowingly devised, intended to devise, and carried out a scheme and artifice to defraud a financial institution as to a material matter and to obtain money and property under the control of financial institutions by means of materially false and fraudulent pretenses, representations, promises, and concealment of material facts, which scheme is described further below. As part of the scheme to defraud, SHAFI deposited a fraudulent check, which purported to have been issued by Setco Services LLC on its account at Centennial Bank.

6. Specifically, on or about June 29, 2015, ADAM SHAFI deposited into his Bank of America checking account number -8058 fraudulent check number 1233, which he falsely represented to have been drawn on Setco LLC's account at Centennial Bank, in the amount of \$2200. The check was dated April 16, 2015, payable to SHAFI. By depositing the check into his Bank of America account, SHAFI falsely represented that he was entitled to the funds as if the check had been lawfully issued.

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20 III

COUNT ONE: (18 U.S.C. §§ 1344(1), (2) – Bank Fraud)

7. The factual allegations in paragraphs 1 through 6 are re-alleged and incorporated herein as if set forth in full.

8. On or about June 29, 2015, in the Northern District of California and elsewhere, the defendant,

ADAM SHAFI,

did knowingly and with the intent to defraud devise and execute, and attempt to execute, a scheme and artifice to defraud a financial institution as to a material matter and to obtain moneys, funds, credits, assets, and other property that were then under the custody and control of financial institutions, by means of false and fraudulent pretenses, representations, promises, and concealment of material facts.

In violation of Title 18, United States Code, Sections 1344(1) and 1344(2).

DATED: December 5, 2018

ALEX G. TSE
United States Attorney

JOHN H. HEMANN
Deputy Chief, Criminal Division

Approved as to form:

Elise Lapunzina
ELISE LAPUNZINA
Assistant United States Attorney